

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

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U.S. POSTAL SERVICE
OFFICE OF THE ATTORNEY GENERAL

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
MAGAZINE PUBLISHERS OF AMERICA WITNESS GLICK
(USPS/MPA-T-3-1-3)

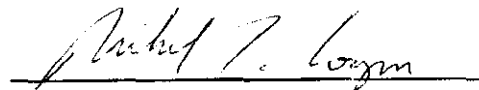
Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to Magazine Publishers of America witness Glick: USPS/MPA-T-3-1-3.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Richard T. Cooper

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Washington, D.C. 20260-1137
(202) 268-2993; Fax -5402
January 28, 1998

USPS/MPA-T3-1. Please refer to Exhibit MPA 3-1.

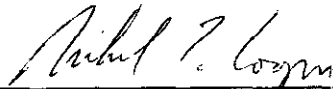
- (a) Please confirm that the letters volume you used to calculate the letters percentage of 51.70% shown in the top row of this exhibit excludes DPS and sector segment mail pieces. If you confirm, please explain why you excluded DPS and sector segment mail from your calculation of the letters percentage. If you do not confirm, please explain fully.
- (b) Please confirm that if your calculation had included DPS and sector segment mail, the letters percentage would have equaled 58.01%.
- (c) If you did not exclude DPS and sector segment in your calculation of 51.70% as the letters percentage, please explain your derivation of this percentage.

USPS/MPA-T3-2. Please refer to USPS-T-5, WP-B, W/S 10.1.1 and 10.2.1, column 2. Please confirm that the DPS and sector segment items listed on line numbers 8a and 8b consist of deliveries of letter-shape mail pieces. If you do not confirm, please explain your understanding of the shape content of DPS and sector segment mail pieces as defined at lines 8a and 8b.

USPS/MPA-T3-3. Please refer to USPS-T-5, WP-B, W/S 10.1.2 and 10.2.2, column 1. Please confirm that the CCS letters delivered volumes that were used to derive the percentages shown in this column 1 include DPS and sector segment volumes. If you do not confirm, please explain your understanding of how the rural CCS file accounts for DPS and sector segment mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Richard T. Cooper

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